

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JULIE DALESSIO, an individual

Plaintiff,

V.

UNIVERSITY OF WASHINGTON, a Washington Public Corporation; ELIZA SAUNDERS, Director of the Office of Public Records, in her personal and official capacity; ALISON SWENSON, Compliance Analyst, in her personal capacity; PERRY TAPPER, Public Records Compliance Officer, in his personal capacity; ANDREW PALMER, Compliance Analyst, in his personal capacity; JOHN or JANES DOES 1-12, in his or her personal capacity,

## Defendants.

No. 2:17-cv-00642-MJP

DECLARATION OF JAYNE L.  
FREEMAN IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO  
PLAINTIFF'S MOTION FOR  
RECONSIDERATION AND MOTION  
TO AMEND COMPLAINT

I, Jayne L. Freeman, declare as follows:

1. I am appointed as Special Assistant Attorney General to represent Defendants in this lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. The following exhibits are cited or relied upon in Defendants' Opposition to Plaintiff's Motion for Reconsideration and Motion to Amend Complaint:

A. Attached as **Exhibit A** is a true and correct copy of email correspondence between Plaintiff's former counsel Joseph Thomas and counsel for Defendants.

B. Attached as **Exhibit B** is a true and correct copy of portions of Plaintiff's Initial Disclosures.

C. Attached as **Exhibit C** is a true and correct copy of the public records request to the University of Washington identified for tracking purposes as PR 2019-00035.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

DATED this 3rd day of July 2019, at Seattle, Washington.

/s/ Jayne L. Freeman  
Jayne L. Freeman, WSBA #24318

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 3, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

**Plaintiff Pro Se**  
Ms. Julie Dalessio  
1110 29th Avenue  
Seattle, WA 98122  
Phone: (206) 324-2590  
Email: juliedalessio@msn.com

**Courtesy copy also sent by e-mail.**

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

N/A.

DATED: July 3, 2019

/s/ Jayne L. Freeman

Jayne L. Freeman, WSBA #24318  
Special Assistant Attorney General for  
Defendant  
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